

1 KEMNITZER, BARRON, & KRIEG, LLP
2 BRYAN KEMNITZER Bar No. 066401
3 ELLIOT CONN Bar No. 279920
4 445 Bush St., 6th Floor
5 San Francisco, CA 94108
6 Telephone: (415) 632-1900
7 Facsimile: (415) 632-1901
8 bryan@kbklegal.com
9 elliott@kbklegal.com

Attorneys for Plaintiff Ashamad Pinchem

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UNITED STATES DISTRICT COURT
DISTRICT OF CALIFORNIA

ASHAMAD PINCHEM,

v.

REGAL MEDICAL GROUP, INC.,

Case No. 2:15-cv-06518-ODW-KLS

Assigned to Judge Otis D. Wright, II
Referred to Magistrate Judge Karen L. Stevenson

DECLARATION OF JEFFREY A. HANSEN IN OPPOSITION TO DEFENDANT REGAL MEDICAL GROUP, INC.'S MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, PARTIAL SUMMARY JUDGMENT STIPULATION TO EXTEND DISCOVERY CUT-OFF DATE FOR THE CONTINUATION OF PLAINTIFF'S DEPOSITION AND EXPERT DISCOVERY ONLY

Date: December 5, 2016
Time: 1:30 p.m.
Courtroom 5D (1st St.)
Hon. Otis D. Wright, II

Unlimited Civil Case

1 I, Jeffrey A. Hansen, declare and state as follows:

2 1. I have been retained by Plaintiff to testify as an expert with regard to the
3 telephone dialing systems and equipment used by Regal Medical Group ("Regal") to
4 contact Plaintiff Ashamad Pinchem's cellular telephone number (213) 822-2182.

5 2. I am an adult over the age of 18, a resident of the state of California. Unless
6 indicated otherwise, I have personal knowledge of each of the matters stated herein,
7 and if called to testify I could and would testify competently about them.

8 3. Attached as **Exhibit 1** is the written expert report that I have prepared I this
9 matter pursuant to Fed. R. Civ. P. 26(a)(2)(b). I have also attached as exhibits
10 excerpts from the documents and evidence that I have relied in making my
11 conclusions. I incorporate by reference the entirety of my report and the attached
12 exhibits.

13 4. I reserve the right to amend, modify or supplement the statements and
14 opinions set forth herein as appropriate.

15 5. I declare that the foregoing is true and correct, subject to the laws of perjury of
16 the United States.

17 Executed this 7th day of November, 2016 in Spring Valley, California.

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20 By:  _____

21 JEFFREY A. HANSEN
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